INTRODUCTION

California welcomes the opportunity to apply for and receive its second-year formula allocation of Welfare-to-Work (WtW) Grant Program funds as provided for in the federal Balanced Budget Act of 1997 (the Act). In August 1997, the state instituted the California Work Opportunity and Responsibility to Kids (CalWORKs) Program. CalWORKs formally implemented the federal Temporary Assistance for Needy Families (TANF) program in California starting on January 1, 1998. CalWORKs provides counties maximum flexibility in designing and implementing their TANF programs to meet local needs. The California Department of Social Services (CDSS) issued CalWORKs planning instructions in October 1997, and local governments and County Welfare Departments (CWDs) developed CalWORKs activities in consultation with workforce preparation entities and other local partners.

The state has developed and implemented strategies for assuring the coordination of employment and training resources with welfare reform. California's network of One-Stop Career Centers, for instance, included CWDs in local planning and policy development, with CWDs in many areas participating in the centers. Job Training Partnership Act (JTPA) programs, operated by California's network of Private Industry Councils (PICs), are also serving more welfare recipients in more innovative ways than ever before.

Consistent with CalWORKs legislation and the first-year WtW Grant Program Plan, California's approach to implementation of its second-year WtW Grant Program is one of local determination and accountability. Given the extreme diversity of the state's 58 counties and 52 PICs, there is no one service strategy that is being applied statewide. Many of California's WtW Grant Program operators have experienced delays in implementing their first-year WtW programs. Delays in approval of the first-year State WtW Plan and release of WtW funds to PICs, coupled with local-level coordination issues have resulted in initial lower participant enrollment levels than anticipated. However, the state has acknowledged these difficulties and has solicited the assistance of the various state and local partners to ameliorate these implementation issues. A number of ongoing coordination strategies have been established with the partners and are described in the State WtW Plan. Local partners will be expected to continue working together to develop targeting and service strategies that will meet their community's demographic and workforce needs and will result in increased services to WtW clients during the second program year.

To assure accountability, PICs will be required to modify their WtW Grant Program plans to reflect changes planned for the second program year. The PICs will develop these modifications in collaboration with CWDs, local government, and other partners to ensure that they meet the needs of their areas and are consistent with local CalWORKs activities.

The CWDs are required by AB 382 to submit an addendum to their CalWORKs WtW plan annually addressing changes to their WtW grant programs, program processes and coordination efforts. Additionally, PICs have described in their local plans how they are collaborating with the business community, foundations, community-based organizations (CBO), and other appropriate entities to leverage resources, create jobs, and identify other opportunities which will assist long term welfare recipients in achieving self sufficiency. Any changes to this collaboration will be reflected in the second-year plan modification. The state will continue to provide necessary policy guidance, technical assistance, and oversight for the local programs.

I. WELFARE-TO-WORK PROGRAM DESCRIPTION

A. Program Design:

1. Describe the state and local targeting strategies to reach the hard-toemploy TANF recipients eligible under WtW and assure that appropriate activities and services are provided to help these participants achieve selfsufficiency.

In California, the local partners are responsible for developing targeting strategies to reach hard-to-employ CalWORKs recipients eligible under the WtW Grant Program. The PICs are required to collaborate with local government officials and CWDs to determine the needs and priorities of the local areas, their targeting strategies, the range of services they will make available, as well as the strategies they will employ to ensure that eligible participants receive the appropriate services. The PICs must also demonstrate continuing coordination and consultation with other partners such as One-Stop Career Centers, community colleges, providers of supportive services, transportation and housing agencies, foundations, the business community, and economic development organizations in development and adoption of these strategies.

At the state level, the Employment Development Department (EDD) and the CDSS have maintained a close working relationship which began with the development and planning of the state and local plans for the first year and will continue through the life of the program. Regular meetings are held with a WtW Grant Program Advisory Group, which includes CWDs and PICs, to discuss local coordination and issue resolution. Additionally, the EDD has maintained the WtW State Partners Work Group for collaboration with the various state entities in the continuing implementation of this program.

As required in federal law, at least 70 percent of the formula grant allocation will continue to be spent on individuals described under 20 CFR 645.212. These individuals include:

- CalWORKs recipients who have been on aid for 30 consecutive or cumulative months or more or who are within 12 months of the federal or state-imposed durational time limits on aid. These recipients will also have to meet at least two of the three following barriers to employment:
 - ✓ They failed to complete secondary school or to obtain a certificate of general equivalency, and they have low skills in reading or mathematics;
 - ✓ They require substance abuse treatment for employment; and/or
 - ✓ They have poor work histories;

- A non-custodial parent of a minor child, where either the custodial parent or the minor child are in receipt of TANF benefits, and where the non-custodial parent meets the criteria listed above; and
- Individuals who meet two of the three specified barriers to employment and who are no longer receiving TANF assistance because they have reached the federal five-year lifetime limit or a state-imposed lifetime limit on aid.

As allowed in federal law, up to 30 percent of the formula grant allocation may be spent on individuals described under 20 CFR 645.213. These individuals must have characteristics associated with or predictive of long-term welfare dependence and be either:

- TANF recipients;
- Non-custodial parents of minors whose custodial parents are receiving TANF assistance; or
- Individuals eligible to receive TANF assistance but no longer receiving aid because they have reached either the federal five-year lifetime limit or a stateimposed lifetime limit on aid.

In their local plans for the first-year WtW Grant Program, the PICs identified additional characteristics of long-term welfare dependency they are using for eligibility purposes. The most commonly identified additional characteristics statewide are:

- Poor or no work history;
- Pregnant or parenting teen;
- Runaway youth;
- Transportation problems;
- Child-care problems;
- Basic skills deficient; and
- Monolingual other than English or Spanish.

During the second program year we expect the PICs will continue using similar criteria when targeting participants for service.

2. Define and describe state and local strategies regarding:

a. the employment activities (community service, work experience, job creation through public and private wage subsidies, on-the-job training) that are planned under this grant.

California has taken advantage of all employment activities allowable under the WtW Grant Program. For the purpose of this specific federal WtW Grant Program and in order to receive the WtW Grant funds, the State of California will continue to comply with the Fair Labor Standards Act in accordance with

the guidelines issued by the Department of Labor (DOL) as of June 30, 1998.

The mix of employment activities and services, which a PIC will provide for eligible participants under the WtW Grant Program, is identified in each PIC's local plan. The PICs are collaborating with CWDs, local government, workforce preparation and education entities, CBOs, the business community, economic development organizations, and other local partners to determine both the need for and the availability of services.

The WtW activities will continue to be defined consistent with federal law and regulations. Community Service, Work Experience, and On-the-Job Training (OJT) programs are being operated pursuant to the state approved definitions outlined below. Job creation is an allowable WtW activity and has been defined locally. The WtW employment activities and their definitions are:

Community Service positions can be with public or private non-profit employers. Participants in community service positions funded through the WtW Grant Program are considered temporary employees, will apply for the work and be subject to hiring and termination by the employer, and will be expected to perform work for the benefit of the employer. The activity must comply with the anti-displacement provisions contained in State law.

Work Experience can be with public or private employers. Participants in work experience positions funded through the WtW Grant Program are considered temporary employees, will apply for the work and be subject to hiring and termination by the employer, and will be expected to perform work for the benefit of the employer. The activity must comply with the anti-displacement provisions contained in State law.

On-the-Job-Training is employment by an employer in the public or private sector. A portion of the wages paid by the employer may be reimbursed to cover the employer's expense in training the individual.

Job Creation, in which the WtW client draws a salary and is considered to be an employee, is available through public or private sector employment wage subsidies.

b. the utilization of contracts with public and private providers of job readiness, placement and post-placement services; job vouchers for placement, readiness, and post-employment services; job retention, or support services, if not otherwise available to the individual participants receiving WtW services, that are planned under this grant.

The CalWORKs Program places no restrictions on the ability to contract with public or private entities for the provision of various services. The PICs, the local administering agencies for the WtW Grant Program, have extensive experience in contracting for services and have access to a wide array of service providers in each community. The PICs demonstrated in their local plans how their use and provision of supportive services supplements the local CalWORKs plan and supports local priorities and needs. Any changes to this will be reflected in the second-year plan modification. Job placement services financed through vouchers or contracts with public or private providers are subject to the one-half payment/six month federal WtW requirement when individuals are placed in unsubsidized employment.

Of the following list of allowable activities, none, except for job readiness, are defined in CalWORKs. All of these activities, as outlined in the WtW regulations, will be available under California's WtW Grant Program.

Job Readiness Services, through vouchers or contracts with public or private providers. These services will provide the recipient with training to learn job seeking and interviewing skills, to understand employer expectations, and learn skills designed to enhance an individual's capacity to move toward self-sufficiency.

Job Placement into subsidized or unsubsidized employment with a public or private employer, through vouchers or contracts with public or private providers. Job placement includes but is not limited to assessing skills, identifying ranges of occupations available in the local labor market, and developing jobs.

Post-employment Services, financed through vouchers or contracts with public or private providers, including, but not limited to, basic educational skills training, occupational skills training, English-as-a-second-language training, and job mentoring.

If an operating entity is also directly operating a community service program, a work experience program, an OJT program, or a program to create jobs through wage subsidies, then job placement, job readiness, and post-employment activities may be offered by the operating entity as part of these services.

Job Retention and Support Services, if these services are not otherwise readily available. Job retention and support services will include but not be limited to child-care, transportation, mental health, and non-medical substance abuse treatment as necessary to obtain or retain a job.

Individual Development Accounts (IDAs) established by or for an individual that allow the individual to contribute earned income in order to accumulate funds for the following purposes:

- Postsecondary educational expenses paid directly to an eligible educational institution;
- Qualified acquisition costs for a qualified principal residence; and/or
- Transfer to a business capitalization account, established in a federally insured financial institution.

Contributions of earned income to IDAs may also be made by not-for-profit organizations and state or local government agencies, as described in section 404 (h)(3)(B) of the Social Security Act.

3. Describe the state and local policy and procedures which will govern implementation of such activities. Include how WtW funds will be used to provide necessary support services (child-care, substance abuse treatment, transportation, etc.) when these services are not otherwise available to the individual participants receiving WtW services.

The State is continuing to consult with the PICs, the CWDs, and other partners in determining policy direction and procedures for the WtW Grant Program. Policy guidance and procedures are provided through the use of directives, information bulletins, capacity building activities, and on-site reviews. In future development of policy direction, the State will focus on facilitating coordination of the WtW Grant Program with the CalWORKs, JTPA, and the California Department of Transportation (Caltrans) Job Access/Reverse Commute programs, as well as other programs that serve welfare recipients.

At the local level, the PICs and CWDs have developed county CalWORKs plans and are continuing this coordination to second-year planning for the WtW Grant Program. Several approaches are being used, ranging from CalWORKs providing all supportive services, with WtW concentrating only on job placement, to a mix of services provided by each program. The particular mix of activities and implementation strategies, and the coordination of services and providers that will be used within each SDA, has been described in the local plan. Any changes to this will be reflected in the second-year plan modifications.

The state is continuing to strengthen and build local partnerships through the One-Stop Career Center System which, through its integration of services, provides improved linkages between the CWDs, PICs, other state and local workforce preparation and human service programs, education, and business and economic development organizations. This collaborative process is being used to identify service gaps and local strategies to fill them. When supportive services such as child-care, substance abuse treatment, and transportation are not available from

other sources, WtW funds are used to provide such services based on local agreements among the various stakeholders.

4. List the performance goals and outcomes the state intends to achieve in serving the eligible participants in the WtW program including: (a) placement in unsubsidized jobs; (b) duration of such placement; and, (c) increase in earnings. The performance goals and outcomes should be expressed in measurable, quantifiable terms to the greatest extent possible.

California's WtW Grant Program performance goals for the second-year grant include a placement rate, a follow-up employment rate, and a follow-up increase in earnings goal. These goals are based in part on the state's historical experience in serving JTPA participants with similar characteristics to the target group for the WtW Grant Program. These are initial targets based on limited data. The state understands that the participant population and the program design for WtW are different than those under the JTPA. During the first year of program operation, many PICs have noticed a trend that could affect job placement rates. The local CWDs are taking an active role in job placement, while WtW funds are being used more for post-placement retention services. The state will continue to refine the performance goals as the program progresses and additional quarterly data become available.

The state will retain its three goals for the WtW Grant Program from the first year. These goals are: to place at least 45 percent of WtW clients into unsubsidized employment; that at least 70 percent of the participants placed into unsubsidized employment should be employed six months after placement; and that the average weekly income at six month follow-up should increase by 10 percent over the average weekly income at placement for participants who remain employed for six months. The definition of placed into unsubsidized employment includes all participants who are placed in unsubsidized jobs for the first time while receiving WtW services. This will not include participants who are placed in any job for which the employer receives a wage subsidy. Although participants will continue to receive WtW services and may go on to a second job, the first unsubsidized job will be counted as placed into unsubsidized employment. Additionally, the 6-month job retention begins on the date of the first unsubsidized job.

These goals will be used as benchmarks to assist the state in providing technical assistance to local areas that may require it, although the state recognizes that local performance goals may differ somewhat from those in the state plan. The PICs will be describing in their second-year local plan modifications their local performance goals for placements, job retention, and increased earnings at follow-up for the WtW Grant Program.

California will continue to report WtW activities and outcomes to the DOL on a quarterly basis. Additionally, California, through Senate Bill (SB) 645 (Chapter 771, Statutes of 1995), has instituted an education and job training report card system to assess the accomplishments of the state's workforce preparation programs. The SB 645 program gathers information from various state databases, including the Unemployment Insurance Base Wage File system, in order to report program outcomes including:

- Employment rate;
- Earnings before and after participation;
- Rate of change in status from tax receiver to tax payer; and
- Length of employment retention.

The state will consider incorporating the WtW Grant Program into the mix of programs currently participating in this system. However, a full year of data on first-year participants would not be available until June 2000.

5. Provide a description of how the program will be implemented by PICs across the state, including the roles and responsibilities of the state WtW administrative agency and the TANF agency; a list of the substate areas and the local entities responsible for program administration; and, the program's implementation target dates.

California has designated the 52 PICs as local administrative entities, unless a specific PIC refuses to accept the grant, or the PIC Chair, the Chief Local Elected Official, and the County Board(s) of Supervisors within the SDA are unable to reach agreement as to the administration of the program. During the first program year, all 52 PICs chose to accept and administer their WtW funds. The state expects that this situation will be repeated for the second-year WtW Grant. However, should such agreement not be reached for the second year, the state will work with the local area to resolve the problem. In the absence of a resolution, California may seek a specific waiver for an alternate local administrative entity through the plan modification process. Attachment B contains a list of the 52 SDAs and their PICs.

Each SDA's program design is based on local needs, as determined by the PIC in collaboration with the CWD, local government, and other local partners. Second-year local plan modifications will describe any changes to the local program design and implementation strategies. Modifications will include any changes to existing ongoing local collaboration between the PIC, the CWD, and other local partners including the community colleges, education, transportation, housing, the business community, foundations, child-care organizations, economic development organizations, CBOs serving low-income populations, and other appropriate entities. The modifications will include the signature of the PIC Chair and the Chief Local Elected Official, and action by the County Board(s) of

Supervisors within the SDA. Local plan modifications will be developed jointly between the PIC and the CWD. The County Board of Supervisors will consider the input of the CWD when Board action is taken.

The EDD is the state administrative agency for the WtW Grant Program. The EDD also provides state-level administration for the JTPA program and has systems in place for issuing policy guidance, collecting program and participant data, and administering fiscal and monitoring procedures. The EDD will continue to work closely with the CDSS, the CalWORKs agency for California. In addition, the EDD will continue to provide policy guidance to PICs for collaboration and coordination with CWDs in their administration of the WtW Grant Program. The CDSS will continue providing similar guidance to the CWDs, which administer CalWORKs at the local level.

Please refer to Section C for more detailed information on the state-level collaborative process.

California will begin implementation of the second-year WtW Grant upon receipt of a Notice of Obligational Authority from the DOL. Funds will be obligated to the SDAs within 30 days of receipt, consistent with federal and state law.

6. Identify the state policies and procedures developed in coordination with PICs regarding: (a) identification and referral of participants; and, (b) assessment and case management, if any. Include a description of the coordination efforts that the local TANF and administrative agency will undertake in this process, including the role these local agencies will play in providing assessment and case management to qualified participants. Specify any additional characteristics associated with, or predictive of, long term welfare dependence which have been identified by the state, in consultation with the operating entity, which will be used in determining eligibility under the thirty percent provision.

The WtW Grant Program has been designed and is being operated locally, based on local needs and resources. The state will continue to provide overall guidance, technical assistance, and oversight. Determining specific program elements, such as the identification and referral of CalWORKs clients, or the roles of local agencies in providing assessment and case management, is a local responsibility that will be addressed by the PICs in cooperation with the local CWDs and included in the local plan modifications. The local mechanisms developed will be consistent with the requirements set forth under 20 CFR 645.214.

In some areas of the state, the local JTPA and CalWORKs programs are administered by the same county agency. Some areas have developed, or are in the process of developing, shared data systems. This expedites the case management activities for the WtW Grant Program. In other counties, a

Memorandum of Understanding has been negotiated and established between the PIC and the CWD delineating their respective roles with regard to serving welfare recipients.

The PICs and the CWDs have chosen from existing assessment models or negotiated their own, unique system for referrals, assessment, and case management. The PICS are not required to complete a new assessment or individual responsibility plan for WtW participants when an assessment and plan has been provided by the CWD under the CalWORKs program.

The PICs are required to describe in their local plans how they will ensure that CalWORKs and WtW activities are coordinated and, specifically, which agencies will be responsible for assessment and case management of WtW clients.

- 7. Describe the state's procedures for conducting monitoring and oversight of substate areas to ensure adequate fiscal controls and achievement of quality program outcomes for WtW participants. The description should include, but not be limited to:
 - a. mechanisms for monitoring expenditures of match requirements, allowable activities, and targeting of eligible participants;

The EDD and CDSS are accomplishing oversight of the WtW Grant Program through joint monitoring efforts. A Memorandum of Understanding (MOU) is currently being completed between the EDD and the CDSS that addresses each department's responsibilities for the administration of the WtW program in California. Specifics of the MOU include: reporting, monitoring, and assignment of liability for match expenditures; and the provision of data to meet the individual participant reporting requirements expected from the U.S. Department of Health and Human Services.

The EDD's Compliance Review Division (CRD) conducts ongoing program and fiscal monitoring reviews of California's JTPA programs to ensure program compliance and fiscal integrity in accordance with applicable federal and state laws, regulations, and policies. The Monitoring Section within the CRD is also responsible for the monitoring of all PICs (or alternate administrative entities if any are designated for the WtW Grant Program) and other contract providers receiving funding under the 15 Percent Special Project Funds.

The scope of the EDD's monitoring reviews is outlined in WtW Grant Program monitoring guides for various areas of operation and accomplished through a combination of desk reviews, on-site reviews, and a review of management information systems. Areas being covered through this monitoring process include allowable activities, services to targeted participants, and fund

management. The WtW monitoring guides include applicable federal and state compliance requirements and provide a structured, uniform approach for reviewing and identifying noncompliance issues and follow-up on corrective actions.

The EDD conducts its monitoring reviews in accordance with established monitoring protocols which require:

- Advance scheduling and notification of onsite visits;
- · Advance sharing of monitoring guides;
- Formal entrance and exit conferences;
- Issuance of draft and final reports; and
- On-site follow-up to ensure that agreed-upon corrective action to resolve compliance issues is successfully implemented.

Furthermore, monitoring protocols require coordination with the assigned program manager in the Workforce Development Branch, so that prompt technical assistance is provided regarding required corrective action to ensure program improvement and compliance with federal and state law.

The CDSS has required that CWDs include certification, in a CalWORKs plan amendment, that only eligible clients will be served in allowable activities under the WtW Grant Program. In addition, specific instructions regarding the WtW Grant Program have been issued to counties in the form of an All County Letter. The CDSS will monitor the use of the matching funds, which will be administered locally by CWDs. Since the counties are responsible for the implementation of public assistance reform, the Administration, with concurrence of the State Legislature through the Budget Act, has provided the WtW Grant match funds to the local CWDs as an augmentation to the CalWORKs program. The allocation of these match funds to the counties enhances their overall welfare reform efforts, and promotes the opportunity to work collaboratively at the local level with the PICs.

The CDSS monitors the overall use of the expenditures meeting the WtW Grant match requirements, as reported by the counties, on a quarterly basis. This is achieved by separate identification of all match expenditures to unique identifier codes used in the County Expenditure Claim. The CDSS will continue to monitor the overall expenditures through this process for reporting to EDD.

Additionally, the CDSS is also monitoring the matching expenditures by utilizing the County Performance Sample (CPS). The CPS is specifically geared to meet the federal reporting requirements associated with the federal TANF program. Because the WtW Grant match participants are a specific sub-population served in the CalWORKs program in California, these

individuals may be included in the CPS when it is drawn on a statewide basis. However, the sample cases are reviewed to specifically glean the information necessary to meet the TANF reporting requirement purposes. This information is based on case characteristics and is not directly tied to the expenditure of funds.

Under the intent of devolution in the federal TANF legislation, the CDSS has embraced the flexibility and autonomy provided to the states and passed this same principle to the local level in the CalWORKs program. CWDs are empowered not only with the responsibility but the accountability for their program operations. To this end they must meet the general audit requirements associated with Office of Management and Budget Circular A-133, generally embodied in the Single Audit Act, and any other audit requirements that ensure the adequate and accurate expenditure of governmental funds.

b. frequency of monitoring;

EDD's goal is to monitor each SDA's procurement and financial system onsite annually for WtW compliance purposes. Additional on-site reviews of other WtW Grant Program areas will be conducted on a risk assessment basis. The risk assessment process will consist of a comparison of actual versus planned performance (expenditures and enrollments). SDAs whose actual fiscal year (FY) 1999 performance is at least 25 percent of their planned performance will be subject to an on-site monitoring review. In addition, the risk assessment process will consider instances of non-compliance reported to SDAs as a result of previous monitoring reviews of JTPA funded programs. Therefore, SDAs will be considered for monitoring if significant instances of non-compliance have been reported to them as a result of previous programmatic reviews even if their actual performance does not exceed the 25 percent threshold. The assessment process will commence after PY 1999 first quarter performance has been reported, and on-site reviews may begin during the second quarter of FY 1999. Because of the difficulties encountered implementing the WtW grant program for FY 1998, the number of SDAs that will be monitored for programmatic areas during FY 1999 cannot be reasonably estimated; however, EDD's goal will be to monitor each SDA. Lastly, CDSS will review the rates of expenditures reported by the CWDs for the WtW Grant Program.

c. use of technical assistance to ensure compliance with the Act and as a tool for corrective action and program improvement.

The EDD and CDSS are providing technical assistance to PICs, CWDs, and other contract providers receiving 15 Percent Special Project Funds by use of directives, information bulletins, capacity building activities, and other appropriate activities. These efforts emphasize compliance with the Act and regulations, joint collaboration between local partners, and improved services to and employment of long-term welfare recipients. Any problems identified in monitoring visits are being followed up with prompt technical assistance and local corrective action plans.

8. Describe the strategies of the state and the PICs to prevent duplication of services and promote coordination among WtW, TANF, JTPA, one-stop centers/employment services and other employment and training systems throughout the state.

Coordinating the design and delivery of services to WtW participants, in conjunction with those available to other workforce preparation customers, including CalWORKs recipients, will ensure that the resources and services of the entire system are available to WtW participants. The EDD is working with SDA directors, county welfare directors, and other key stakeholders to provide public forums for information sharing on successful practices and coordination efforts. In the summer of 1998, for instance, the EDD, along with the DOL and other in-state partners, conducted a WtW Practitioners Forum, which was attended by over 400 local WtW practitioners. At the state level, the WtW State Partners Workgroup, representing fifteen California state agencies, provided advice in preparing the second-year state WtW Grant Program plan, and is continuing to meet to facilitate state and local coordination, issue resolution, and joint capacity building to each organization's local constituencies. The WtW State Partners Workgroup has developed and is implementing a WtW website (www.welfaretowork.ca.gov) to communicate program and service resource information to state and local WtW practitioners. The website is intended to be a source for information regarding supportive services, education, training, employment assistance, and other services needed to enable participants to transition from public assistance to self sufficiency. The WtW website links to local area agency offices providing services to the WtW population in an effort to assist local practitioners in locating service The local agency listing includes local Community Service and Development providers, California Tribal Organizations and Native American Services, local Rehabilitation offices, SDA offices, EDD's Job Service offices, CDSS county offices, and California Department of Education's Regional Occupational Centers and Programs.

At the local level, California has made significant investment in and progress toward developing a statewide One-Stop Career Center System. The CDSS and the CWDs have been represented on the One-Stop Career Center System Task Force since its inception. The Task Force is responsible for the design and implementation of local One-Stop Career Center systems in California. All local One-Stop Career Center grants awarded to date have included CWDs as partners in local system implementation. The EDD was directed to make CWDs mandatory partners in One-Stop Implementation Grant proposals for the second and third years.

Other strategies that are being used to prevent duplication of services and promote coordination include:

Minimizing or avoiding duplicative employer contacts by multiple agencies to solicit job openings.

Assembly Bill (AB) 67 (Chapter 606, Statutes of 1997) requires the EDD to convene local groups representing Job Service field offices, CWDs, SDAs, and community colleges to develop a local plan on how these entities will regularly coordinate employer outreach activities and the solicitation of entry-level and other job listings. This is an ongoing initiative.

 Developing expanded collaborative local/regional networks that encourage the participation of a greater range of public and private sector service providers, stakeholders, and the business community.

AB 1542 (Chapter 270, Statutes of 1997) established the Regional Workforce Preparation and Economic Development Act (RWPEDA). The RWPEDA requires that the Secretaries of the California Health and Human Services and Trade and Commerce Agencies, along with the Chancellor of the California Community Colleges, and the Superintendent of Public Instruction, develop an integrated state workforce development plan for service delivery, resource investment, and performance measures. The plan is being developed with substantial local input so that education, workforce preparation, and economic development services can be delivered to clients in a more responsive, integrated, and effective manner.

The RWPEDA also requires that regional work force collaboratives be funded and directs state partners to identify existing funds that are available to support the establishment of these collaboratives. Five million dollars, including \$1.5 million in WtW 15 percent funds, was made available for the first year of the program to fund collaborative efforts which promote effective service delivery through integration of existing partnerships. Six such collaboratives were funded and more are expected to be funded in the second year of the program.

Additionally, under AB 1542, the EDD is in the process of establishing a council of retired and former corporate executives to provide ongoing advice and assistance to the EDD in recruiting private employers to employ welfare recipients.

Finally, AB 1542 established the Job Creation Investment Fund Grant Program (JCIF) which is administered by the Trade and Commerce Agency. The purpose of the JCIF is to allocate funds to counties to be used for job creation activities that will provide employment for CalWORKs recipients who are moving into the work force. Counties are encouraged to link job creation plans and activities with local WtW activities and initiatives.

Requiring local-level coordination of WtW activities.

AB 382 (Chapter 6, Statutes of 1998), requires the EDD, as part of its local WtW plan review process, to certify that PICs and CWDs have jointly developed protocols for the identification and referral of WtW clients and the provision of WtW services.

9. Describe the strategies of the state and PICs to promote and encourage coordination with the State Department of Transportation, MPOs, transit operators and other transportation providers to help ensure that the transportation needs of those moving from welfare-to-work are met.

The Caltrans is a member of the WtW State Partners Workgroup, and has discussed the resources and assistance services that its local affiliate agencies could contribute to the WtW planning and decision-making processes. As with the other state partners, Caltrans will work with, and encourage its local affiliates to work closely with, the PICs and CWDs to identify and develop strategies for closing gaps in local transportation systems and using transportation to support successful job retention of WTW participants. Caltrans is also participating in the WtW State Partners Workgroup web page.

At the local level, the CWDs' CalWORKs plans address transportation needs of recipients and how those needs will be met. In many areas, workgroups including the PICs, CWDs, local transportation agencies, and other service providers are addressing transportation issues. One California county's CalWORKs Transportation Committee applied for and received a DOL WtW Competitive grant to supply additional transportation so that residents of outlying areas can become self-sufficient. Another county's cooperative efforts resulted in a Welfare Mobility Plan that included an assessment of opportunities to apply low cost modifications to transit centers to facilitate welfare reform implementation. This project was one of only five pilot planning grants funded nationwide by the Federal Transit Administration in 1997-98. PICs have described local efforts to address

the transportation needs of WtW participants. Any changes to this will be reflected in the second-year plan modification.

10. Describe the strategies of the state and PICs to promote and encourage coordination with the State Housing Finance Agencies, public and assisted housing providers and agencies and other community based organizations, and public and private health, mental health and service agencies, vocational rehabilitation and related agencies.

The State Department of Housing and Community Development (HCD), as a member of the WtW State Partners Workgroup, has identified local programs that address housing needs of low income families and continues to encourage its local affiliates to collaborate with the PICs, the CWDs, and other local agencies in planning for meeting the housing needs of WtW participants.

The EDD encourages the HCD and PICs to collaborate and coordinate with another of the Workgroup's partners, the California Department of Community Services and Development (CSD). Through CSD's statewide network of community services providers, the department administers the Community Services Block Grant, the Low-Income Home Energy Assistance Program, the Department of Energy Low-Income Weatherization Assistance Program, and the Lead Hazard Control Program. These programs provide, among other services, minor home repair and weatherization services for low-income residents. While not all low-income individuals and families who receive assistance through these programs are recipients of CalWORKs, the services provided serve to stabilize the lives of all participants.

The PICs are part of the local CalWORKs planning process and are in the process of developing linkages with local housing agencies and other social service providers. Each PIC has described in its local plan coordination with various programs and providers and their respective roles and responsibilities. This includes how WtW participants will access housing assistance, mental health services, substance abuse treatment, and vocational rehabilitation services. Many of the local One-Stop Career Centers provide access to on-site services. Any changes to this will be reflected in the second-year plan modification.

B. Within State Distribution of Funds:

Describe the formula factors, including the weights assigned to each factor, used by the state to allocate not less than 85 percent of the amount of grant funds among the PICs in the state as well as the timeline for the allocation to PICs. Provide a listing of the allocations the state will make to each substate area.

California will distribute 85 percent of the state's WtW funds to the 52 Service Delivery Areas based on the following formula:

- Relative number by which the population in the area below poverty exceeds 7.5 percent of the total population.
 Relative number of adults residing in the 30 percent
- Relative number of adults residing in the areas receiving assistance under TANF or the predecessor program for at least 30 months.
- Relative number of unemployed individuals 15 percent residing in the area.

This allocation formula ensures that all SDAs in California will receive the \$100,000 minimum threshold for funding, and focuses funding on rural areas with high unemployment and inner city areas with high poverty and difficult employment issues. The chart on the following page displays the Fiscal Year 1999-00 allocations to SDAs.

SDA NAME	SDA ALLOCATION
ALAMEDA	\$1,397,964
ANAHEIM	\$1,067,340
BUTTE	\$1,206,765
CARSON/LOMITA/TORRANCE	\$496,913
CONTRA COSTA	\$989,264
FOOTHILL	\$1,198,234
FRESNO	\$7,064,865
GOLDEN SIERRA	\$711,803
HUMBOLDT	\$648,747
IMPERIAL	\$1,515,138
KERN/INYO/MONO	\$4,438,981
KINGS	\$726,477
LONG BEACH	\$3,372,783
LOS ANGELES CITY	\$30,016,252
LOS ANGELES COUNTY	\$21,075,924
MADERA	\$739,151
MARIN	\$152,579
MENDOCINO	\$437,337
MERCED	\$1,779,986
MONTEREY	\$1,572,599
MOTHER LODE	\$413,285
NAPA	\$177,524
NORTHERN RURAL TRAINING AND EMPLOYMENT	\$1,068,469
NORTH CENTRAL COUNTIES	\$1,509,133
NORTH SANTA CLARA VALLEY JOB TRAINING CONSORTIUM	\$271,600
OAKLAND	\$2,832,713
ORANGE	\$3,185,885
RICHMOND	\$634,396
RIVERSIDE	\$5,621,130
SACRAMENTO	\$6,142,166
SAN BENITO	\$172,503
SAN BERNARDINO CITY	\$2,098,727
SAN BERNARDINO COUNTY	\$6,361,291
SAN DIEGO	\$10,424,729
SAN FRANCISCO	\$2,151,628
SAN JOAQUIN	\$3,333,681
SAN JUAGUIN SAN LUIS OBISPO	\$580,566
SAN MATEO	\$387,360
SANTA ANA	\$2,080,007
SANTA ANA SANTA BARBARA	\$1,228,085
	\$2,440,501
SANTA CRUZ	\$817,001
SANTA CRUZ	\$1,314,413
SOUTHEAST LOS ANGELES COUNTY	\$887,530
SHASTA	\$956,664
SOLANO	\$804,358
SONOMA	\$2,018,565
SOUTH BAY	\$2,476,832
STANISLAUS	
TULARE	\$3,432,764 \$1,678,374
VENTURA	\$1,678,374 \$1,825,374
VERDUGO	\$1,835,374 \$607,050
YOLO	\$697,050
TOTAL	\$150,643,406

C. Coordination and Consultation:

Describe the approach, including process and timing, used to obtain and take into account consultation and coordination with substate entities such as public, private and non-profit organizations, in the development of the state plan. Include either a summary description of the comments received, along with the names of the individuals or entities who commented, or include copies of the actual comments received as an attachment to the plan.

California used its existing collaborative infrastructure to ensure optimal consultation and coordination with both state and local partners in developing and reviewing the second-year state plan for the WtW Grant Program. With the passage of the Act in 1997, and notification to the states of the WtW Grant Program, the California Health and Human Services Agency convened a work group consisting of EDD and CDSS managers and staff to analyze the legislation, identify issues, make recommendations to the Governor in policy areas that required his direction, and assign responsibilities for developing the necessary state planning processes. The aforementioned workgroup has been superseded by EDD and CDSS manager and staff participation in a variety of other forums. Staff and management from both the EDD and the CDSS continue to consult on a regular basis. Meetings were also conducted, as a part of the effort, with CWD Directors and SDA Administrators, involving them in the early stages of program development. The state has now established a WtW Advisory Group, consisting of CWD Directors, SDA administrators, the EDD, and the CDSS. This group meets regularly to discuss policy and administrative issues of concern to local providers.

Additionally, the EDD convened a WtW State Partners Workgroup. One of the roles of this work group is to provide input and direction in the planning process. That group consists of:

- The EDD:
- The CDSS:
- The Caltrans;
- The California Department of Education;
- The Department of Mental Health;
- The Chancellor's Office of the California Community Colleges;
- The Trade and Commerce Agency:
- The Employment Training Panel;
- The Department of Alcohol and Drug Programs;
- The Department of Community Services and Development;
- The Department of Housing and Community Development;
- The Department of Rehabilitation:
- The State Job Training Coordinating Council;
- The Department of Aging; and
- The Department of Motor Vehicles.

The workgroup developed an Internet WtW website (**www.welfaretowork.ca.gov**) that provides an overview of services and funding sources available through the fifteen member departments/agencies to assist welfare recipients and other low-income individuals in obtaining and retaining employment.

The EDD was directed to conduct public hearings under the auspices of the SJTCC on the proposed 1999 WtW Grant Program state plan. Four hearings were held throughout the state in February to accept public comment on the plan from state and substate entities, including public and non-profit organizations and the general public. Attachment C contains a summary of comments received through the public review process.

D. Expenditure of Funds:

1. Describe the process the state will use to maintain administrative costs at the 15 percent limit.

California will allocate the full 85 percent funds to the SDAs; however, the SDAs will be limited to an administrative cap of 13 percent. The cost limitations are being monitored through the quarterly fiscal reporting system. The state is using the existing JTPA fiscal reporting and tracking system, known as the Job Training Automation (JTA) system, with necessary modifications. The EDD's Job Training Partnership Division (JTPD) is responsible for state-level administration of the JTPA and WtW programs in California. Its Financial Management Unit, in collaboration with the EDD's Fiscal Programs Division (FPD), is establishing a system to ensure that administrative and other cost limits are not exceeded. As the local WtW administrative entities report quarterly fiscal data through the state's JTA system, the FPD will continue to track these expenditures to ensure that they are in compliance with budgeted amounts. Should discrepancies be noted, JTPD will work with the local entities to identify problem areas and prevent excessive administrative costs.

2. Describe how the PIC and any alternate agency designated by the Governor, will coordinate the expenditure of any funds provided for the WtW program between TANF and WtW.

The state will require that each PIC include in its local plan modification a description of how the PICs and CWDs will coordinate to ensure that WtW expenditures support CalWORKs (TANF) expenditures. The County Board(s) of Supervisors were asked to sign the PICs' fiscal year 1998 plans after Board action and certify that the local planning processes for fund expenditures support local CalWORKs activities. This process will be repeated for the fiscal year 1999 local plan modifications. A variety of methods will be used locally, including the use of the

local One-Stop Career Center systems, to build links between CWD and PIC management information systems.

E. Application for Waiver:

California will not request any waivers at this time. The state reserves the right to request waivers at a later date through a plan modification process. A waiver may be requested if a PIC refuses to accept the grant or the PIC Chair, the Chief Local Elected Official, and the County Board(s) of Supervisors within the SDA are unable to reach agreement as to the administration of the program. Should such agreement not be reached, this may indicate potential coordination issues that can effect the efficiency and effectiveness of the program. The state will work with the local area to resolve the problem before submitting a waiver request.

II. DESCRIPTION OF 15 PERCENT PROJECTS TO HELP LONG-TERM RECIPIENTS OF ASSISTANCE ENTER UNSUBSIDIZED JOBS

Describe the state's plans for the expenditure, uses and goals of the 15 percent funds. These funds may be distributed to public, private non-profit and private for profit entities, including PICs, governmental entities, community-based organizations, and community development corporations.

The state distributed the first-year Governor's 15 percent funds to projects that are helping long-term recipients of assistance enter unsubsidized jobs. The EDD issued a Solicitation for Proposals for the available 15 percent funds in May 1998 and received 182 applications from various state PICs, CWDs, and CBOs. The proposals were read and evaluated by individuals from federal, state, and local governmental agencies, as well as volunteers from CBOs. In accordance with the provisions of AB 382, special consideration was given during the review process to agencies serving clients in rural areas. Six regional collaborative proposals, discussed in this plan at Section I. A. 8, were awarded \$1.5 million in 15 percent funds. The remaining \$23 million was distributed to 24 program operators which included CBOs, local Housing commissions, PICs, and CWDs.

In the second year of funding, special consideration will continue to be given to programs that take into account the needs of rural areas, leverage resources, and demonstrate a coordinated approach to services. The Governor may give consideration to statewide projects, local employment-related programs, and innovative new programs for job creation. Applications for state and local projects using 15 percent funds must be provided to the PIC and the CWD for review and comment. These projects will be operated in accordance with the regulatory provisions applicable to the 85 percent funds and are subject to the 70/30 percent targeting provisions of the WtW Grant Program.

III. ESTIMATE OF MATCHING FUNDS

1. Include an estimate of the amount of matching expenditures for the FY 1999 federal funding which the state expects to make during the period covered by the plan.

California will provide \$88,613,768 to meet the 1999-00 required state match for the federal grant.

2. Include the process by which these expenditures will be monitored and reported quarterly to ensure the state meets its projected match.

The state will monitor the use of funds for allowable activities and eligible participants, management of funds, and the accuracy of data collected in management information systems used to report expenditure of funds. The state will continue to report quarterly, in accordance with applicable federal and state laws, regulations, and policies.

Pursuant to the annual development of the state budget, the State of California determines the level of appropriation that will specifically be provided to meet the WtW Grant match requirements in accordance with the three-year matching window provided in the federal legislation. The CDSS and EDD have developed a State Technical Assistance Plan to determine where WtW Grant program coordination and funding streams are being achieved in the state and to provide technical assistance in those areas where it is not. Also, CDSS is committed to working with CWDs to monitor expenditure patterns and discuss new and innovative ways to expend the matching funds (e.g., encourage CWDs to contract back to the SDAs for WtW Grant program services).

IV. FUNDING

The state should submit an estimate of expenditures of WtW formula grant funds for each quarter of the fiscal year by percentage or dollar amount.

Estimate of expenditures of Federal Fiscal Year (FFY) 1999 WtW formula grant funds cumulative for each quarter of each fiscal year covered by the plan by percentage:

FFY 1998-99:

9/99

10%

FFY 1999-00:

<u>12/99</u> <u>3/00</u> <u>6/00</u> <u>9/00</u> 15% <u>25%</u> 40% <u>60%</u>

FFY 2000-01:

<u>12/00</u> <u>3/01</u> <u>6/01</u> <u>9/01</u> 75% 85% 90% 93%

FFY 2001-02:

<u>12/01</u> <u>3/02</u> <u>6/02</u> <u>9/02</u> 95% 99% 99% 100

V. ASSURANCES

See attachment A.

VI. SIGNATURE

Attachments

- A. Assurances
- B. List of PICs and SDAs (http://wwwedd.cahwnet.gov/jtpaloc.htm)
- C. Summary of Oral and Written Testimony/Comments

ASSURANCES

The State of California assures to the following requirements under Title IV-A of the Social Security Act.

PROGRAM ADMINISTRATION/ACTIVITIES

- 1. California is an eligible state, pursuant to Section 402(a) for the fiscal year.
- 2. California assures that qualified state expenditures (within the meaning of Section 409(a)(7)) for the fiscal year will not be less than the applicable percentage of historic state expenditures (within the meaning of Section 409(a)(7)) with respect to the fiscal year.
- 3. California has consulted and coordinated with the appropriate entities in the substate areas regarding the plan and the design of WtW services in the state.
- 4. California will make available to the public a summary of the WtW plan.
- 5. California has agreed to negotiate in good faith with the Secretary of Health and Human Services with respect to the substance and funding of any evaluation under Section 413(j) and to cooperate with the conduct of such an evaluation.
- 6. California shall not use any part of these grant funds, nor any part of state expenditures made to match the funds, to fulfill any obligation of any state, political subdivision, or Private Industry Council to contribute funds under Sections 403(b) or 418 or any other provision of the Social Security Act or other federal law.
- 7. California will return to the Secretary of Labor any part of the WtW funds that are not expended within 3 years after the date the funds are so provided.
- 8. California's WtW program will be conducted in accordance with the WtW legislation, regulatory provisions, future written guidance provided by the Department, and all other applicable federal and state laws.
- 9. California will apply the TANF law and regulations to the operation of the WtW program, unless otherwise specified by the Department or defined in Section 403(a)(5) or the applicable WtW regulations.
- 10. California assures that services under the WtW grant are provided to eligible participants only.
- 11. California will maintain and submit accurate, complete and timely participant and financial records reports, as specified by the Secretary of Labor and the Secretary of Health and Human Services.

- 12. California will establish a mechanism to exchange information and coordinate the WtW program operated by the state and PICs with other programs available that will assist in providing welfare recipients employment.
- 13. California shall adhere to the certifications required under TANF and will meet the TANF maintenance of effort requirements.
- 14. California will comply with the uniform fiscal and administrative requirements of OMB Circular A-102 as codified for DOL at 29 CFR Part 97.
- 15. California will follow the audit requirements of The Single Audit Act of 1984 and OMB Circular A-133.
- 16. California will follow the allowable cost/cost principles of OMB Circular A-87.

WORKER PROTECTIONS

- 1. California will establish policies to enforce the provisions regarding nondisplacement in work activities under a program operated with funds provided under WtW.
- 2. California assures that the Health and Safety standards established under federal and state law otherwise applicable to working conditions of employees shall be equally applicable to working conditions of other participants engaged in a work activity under a program operated with funds provided under WtW.
- 3. California will enforce the provision that an individual may not be discriminated against by reason of gender with respect to participation in work activities under a program operated with funds provided under WtW.
- 4. California shall establish and maintain procedures for grievances or complaints from participants and employees under the WtW program. The procedures established will be consistent with the requirements of Section 403(a)(5)(J)(iv).
- 5. California shall establish and enforce standards and procedures to ensure against nepotism, conflicts of interest among individuals responsible for the administration and supervision of the state WtW program, kickbacks, and the use of political patronage.
- 6. California will comply with the nondiscrimination provisions of the laws enumerated at Section 408(d), with respect to participation in work activities engaged in under the WtW program.

Governor or Authorized Signatory:

ROBERT L. GARCIA Interim Chief Deputy Director, Employment Development Department

Welfare-to-Work Grant Program Second Year Summary of Oral and Written Testimony/Comments

SOURCE	ISSUE	COMMENTS
Community Based Organizations	Other Comments	 The WtW program should acknowledge that WtW is a life change for many of the hard to serve clients. What is the liability for employers for Workers Compensation? Many of the welfare clients file WC claims. Education and supportive services should be available to clients to advance beyond job placement and to assist them to obtain higher paying jobs. In-resident substance abuse care is not an option for mothers because children will have to be placed in foster care. Should be a method/means to continue education/support services to clients beyond the 6 months if successful, to help move up in the job market. Recommendations: Recipients should be involved in a job club situation for 8 hours per day/30 days per month to learn aspects of the job world. CBOs should have access to Workers Compensation records to screen applicants.

SOURCE	ISSUE	COMMENTS
Community Based Organizations	Coordination	 Asked if the State is looking at local procedures to make sure that participants who are eligible are being referred to the WtW program for services. Current procedures at CWDs are preventing the hard to serve from getting service referrals. Suggested that the State review CWD and other local provider's referral processes. Need to work on Assessing client skills to match employer/position needs.
		Recommendations:
		 The State is in the process of trying to make it easier to work together. At the State level, EDD is meeting with CDSS to identify issues and resolve the client referral process. The CDSS will be issuing an all county bulletin that will address some of the issues raised. Efforts should be made to approach employers to learn the workforce needs.
Community Based Organizations	Local Plans	Use Individual Development Accounts (IDA) to serve clients.
Organizations		Recommendations:
		CBO was referred to local PICS or boards to seek modification of local plans. IDAs are allowable use of WtW funds.
Community Based Organizations	Eligible Population	The list of additional characteristics of long term welfare dependency in the state plan does not include victims of domestic violence.
		Recommendations:
		Suggestion to include eligibility characteristics that allow services to victims of domestic violence. Referral to round 3 of competitive awards 25% DOL grants as bonus points will be awarded to those applications that focus on serving victims of domestic violence. The list in the state plan includes the most commonly identified additional characteristics.

SOURCE	ISSUE	COMMENTS
Private Industry	Administration	The 13% administrative funding is insufficient.
Councils		Recommendations:
		 Additional administrative funds should be set aside for capacity building and technical assistance including training in WtW program design.
Private Industry Councils	Performance Goals	 Concern expressed: performance goals too high for initial start up of the WtW program. The initial start up costs in developing the WtW program have been directed towards establishing a workers base for the delivery of services, establishing collaboratives, and at working with organizations to get them to account for outcomes. Current performance goals regarding employment, rates of compensation, and retention are viable goals in JTPA programs, but are counterproductive to the needs of the WtW client base.
		Recommendations:
		Goals should be calibrated in accordance with activity. Some measurable activities might be attainment of employability skills, self-sufficiency, and ability to integrate personal needs with available support systems.
Private Industry Councils	Other Comments	 There is an uneven basis in service delivery providers. Two greatest problem areas are: 1) Teaching organizations to work within groups & team building, and 2) Many CBOs are not connected with the Internet so there is a vast need for capacity building. SJTCC asked speaker to submit written testimony listing their capacity building needs. If a recipient gets training or employment and has to leave the county, who pays for the transportation and relocation expenses?
		Recommendations:
		 Transportation and relocation expenses are allowable services under the WtW if services are not otherwise available.
SOURCE	ISSUE	COMMENTS

Private Industry Councils	Coordination	 What can welfare clients do while they are in OJT or waiting to be placed into employment or educational programs? For example, many academic programs do not begin until June or July. If a client accepts employment, they are re-evaluated and assessed for eligibility. Welfare clients have been told to hold their applications for academic programs until late April or early May because of the 6-month eligibility problem. Statewide enrollment levels in the first year of the program are lower than anticipated. Lack of referrals continues to be a problem.
		Recommendations:
		 EDD staff responded that if a client is deemed eligible for the program, their eligibility is good for 6 months and they should not be reevaluated. LA county just received clarification regarding this issue. LA county is developing technical assistance to train staff to ameliorate this misconception. The CalWORKs program provides enough flexibility at the local level. Clarification will go out to the 58 counties as an All County Bulletin to address this issue. The state plan should acknowledge the issues and describe many of the worthy efforts now underway by both the state and local interests to correct the shortfall.
Local Economic	Other Comments	There is a high illiteracy rate among the WtW
Development Organization		 clients. Need exists for mentoring, case management, and peer support groups. Economic Development groups are working with employers to build mentoring relationships. There is a need for employer incentives. Matching individuals with jobs and commensurate skill levels is difficult. WtW program has done more than any other program to get the PICs & CWDs talking.

SOURCE	ISSUE	COMMENTS
Educational Agencies (Colleges)	Coordination	Santa Barbara City College (SBCC) collaborates with other agencies, including 8 county community colleges that are trying to share information with the CWDs. Confidentiality laws restrict the exchange of information so that many clients are not getting the services that they need. SBCC does not have tools to track information needed by the State for performance reporting.
		Recommendations:
		 CDSS & the Chancellor of the California Community Colleges are aware of the problem and it has been elevated to the highest level, and they are working on solutions. One solution is that each individual student can complete individual confidentiality release forms.
Educational Agencies (Colleges)	Other Comments	 The heavy emphasis on job finding for clients de-emphasizes the need for education and training. Jobs obtained without adequate educational preparation will not provide stable employment nor income. Education and training of clients must be addressed for any realistic attempt at Welfare Reform.
Education (Los Angeles County Office of Education)	Other Comments	 Educational Agencies should be a primary required/mandated partner for coordination of efforts and administration of the WtW program, specifically with relation to the 30% eligible group. Regional Occupational Centers & Programs and local educational agencies want to be notified of WtW hearings and included in the WtW state planning process. Local educational agencies should be designated as the primary providers of programs and services. Concern expressed regarding the PICs participation in the competitive grant process considering that the PICs also receive formula grant funds.

SOURCE	ISSUE	COMMENTS
Education (ROCP)	Performance Goals	On page 7, criteria for success, the average weekly wage at 6 months after placement of 10% seems too high. Seems unreasonable to expect that someone who has been working 6 months will get 10% more money within that time frame. Rates are too high and appear that with this performance goal the program will be a failure.
		Recommendations:
		The State responded indicating that the 10% is not necessarily a wage increase but may instead be an increase in the number of hours an individual is working while getting some training. Employees are probably working part-time, e.g., 16-20 hours/week while receiving training. A suggestion was made that the State Plan should then state that employees are working part-time.
Education (ROCP)	Coordination	 The partners in One-Stops are very cooperative, but what is lacking is collaboration. Everyone wants to protect their own turf. If we want to have a true One-Stop system, things must be done very differently. Most adults are self-enrolled or self-initiated into the ROP programs. They want to get off welfare and they recognize the need for training. There needs to be a more direct way to find these people and offer them programs.
		Recommendations:
		 The state must spend time to help the small businesses trust the bureaucracy. Programs should be driven from the bottom up. Locals need flexibility to focus on client centered programs.

SOURCE	ISSUE	COMMENTS
Education (ROCP)	Other Comments	 More should be done about welfare prevention for the in-school population. Provide SCAN skills to address welfare prevention. Most successful programs focus on the customer. There are two customers in WtW: the client and the employers. Employers, particularly small businesses, need to trust the WtW providers. The WtW program is process oriented rather than product oriented. The emphasis in WtW program is on work first. Is this a function of the economy or client needs? Certain local supportive services such as transportation and child care may not be geared to the needs of individuals but rather may be a one-size-fits-all response to individual needs.
Students (College)	Other Comments	 Hours that students spend studying are not counted toward the work/school related hours mandated by the state. Complying with the 32 hour a week CalWORKs requirement has become difficult when schools have holidays, as there is no time to make up the additional time. Attending A.A. meetings and time spent volunteering as a reading tutor do not count toward the 32 hour per week CalWORKs work requirement. Recommendations: CalWORKs students should have their school holidays, at-home study time, A.A. meeting attendance, and volunteer time count towards their 32-hour work/educational requirements.
Other Interested Individuals	Other Comments	How are jobs going to be created for Welfare Recipients?
		Recommendations:
		Chair referred question to the audience for Economic Development response, but received none.

SOURCE	ISSUE	COMMENTS
CWA	Performance Goals	 The performance goals continue to be too high and unrealistic given WtW program performance during the last year. Goals should be locally defined and rolled up into the state plan. If performance goals only focus on placement and traditional JTPA goals, the PICs will respond with that type of behavior. Less emphasis will be placed on supportive and retention services if PICs are held accountable for performance.
		Recommendations:
CWA	Other Comments	 Include measures in addition to placement in the plan. For the placement goals, use realistic local goals rolled up to the state level rather than picking an arbitrary goal. Place greater accountability emphasis on supportive and retention services. There should be a technical
		assistance/capacity building plan, but the Department of Finance has moved all such funds to next year's program. There is a need to develop training for managers and supervisors on how to work with the WtW clientele, however the Department of Finance (DOF) has decided not to release technical assistance funds until next year. The employer community also needs technical assistance, tools and training to work with the less ready employees. Since California does not have full family sanction under CalWORKs, many adults with young children have selected to accept reduced benefit levels rather than go to work.

SOURCE	ISSUE	COMMENTS
CWA	Coordination	 State Plan does not acknowledge that the WtW program is not going well. The plan should describe problems encountered in implementing the WtW program. State plan should include a description of current implementation status in California. The California Department of Social Services' concern for confidentiality is preventing the sharing of information with the PICs, which is ultimately preventing clients from being served. The CWA is working with CWDs regarding issues of confidentiality and is preparing to cosponsor legislation that will address this issue if necessary.
		Recommendations:
		 Suggest that the State Plan should describe any efforts that are currently underway, to increase WtW program enrollment and improve program performance. The plan should describe technical assistance, training efforts, and capacity building occurring at both the state and local level to assist in designing programs that include retention and training for clients who are already placed and working as a result of CalWORKs efforts. The plan should document progress made to date and identify additional strategies for identification and amelioration of problems.
Private, Nonprofit Organization	Eligible Population	 Homelessness should be included as an additional characteristic of long-term welfare dependency. Proposals that target the homeless, non-custodial parents, persons with disabilities, victims of domestic violence, substance abusers, and individuals with limited English proficiency should be awarded extra points in the Governor's 15% program. Targeted programs that cater to the special needs of these sub-populations have had high levels of success in job placement.

SOURCE	ISSUE	COMMENTS
Local Government	Eligible Population	The list of additional long-term dependency barriers should be expanded. Refer to the Los Angeles County WtW plan for reference.
Local Government	Local Plans	The State should not require all signatures on the local plan that were required last year. This should be waived for at least two-year intervals. The plan stated the intention that PICs submit modifications rather than new plans. Requiring all new signatures will cause major interruptions in L.A. County.
Local Government	Other Comments	 There should be language on Page 19 that permits application of any waivers that may be approved at the federal level during the planning period.
National Employment Support Association	Eligible Population	The State Plan does not articulate any substantive strategy to identify and provide required allowable activities and support services to the target population.
		Recommendations:
		The State Plan should describe how the eligible clients are being identified and how the services they need are being identified.
National Employment Support Association	Other Comments	 State plan has lack of substantive details in certain areas (did not specify which areas). There is hardly any distinction between the WtW State Plan and the CalWORKs plan. Need to provide substance abuse and retention services to make WtW work. The WtW plan should tie in with the state Workforce Development Plan. The State Plan should be more detailed and the strategic plan for implementation should be better articulated.

SOURCE	ISSUE	COMMENTS
Native American Tribes	Other Comments	 Would like Technical Assistance provided to implement Tribal programs. Indian Tribes would like to be included in the state planning process. Have any of the Indian Tribes in California received any of the15% WtW grant funds? The tribes want to be notified when the 15% funds become available. Tribes requested to be placed on future mailing lists. Since there is no exchange of information between tribes and states, there is concern for duplication of services. Time and distance of commute from reservation to nearest town for service delivery creates a transportation problem for tribal members. Given that gaming operations are in litigation in California, there is concern for job creation and job availability for tribal members. To reduce barriers to employment, tribes need assistance with child care and transportation needs. Tribes want to develop a safety net and referral service for individuals and/or family members that may not qualify for some or all of TANF services. Exemptions and options that are available to states should also be made available to the
Audit and Evaluation Division	Performance Goals	 tribes. The Goal to place at least 45% of the WtW clients into unsubsidized employment should be restated to comply with the "measurable" criteria. Recommendations: Modify plan to indicate that at least 45% will have been placed by the end of a fiscal year period.

SOURCE	ISSUE	COMMENTS
Audit and Evaluation Division	Eligible Population	 Request clarification as to why individuals with disabilities and victims of domestic violence were not included in State Plan's list of targeted groups since DOL includes them in their application. Additional characteristics of long-term welfare dependency identified transportation problems.
		Recommendations:
		 Expand characteristic list to include individuals with disabilities and victims of domestic violence. Suggest that since Department of Transportation provides funds through the Job Access project that the plan should contain a statement that existing funds for transportation would be used before WtW funds would be used.
Audit and Evaluation Division	Other Comments	Would like clarification made between PICs and Local Partners. (Definition) Please clarify if EDD's Compliance Review Division is still responsible for monitoring matched expenditures. The total formula allocation fund state distribution is overstated by eight dollars and should contain a footnote if this is due to a rounding issue.